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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

WILLIAM RABAGO, an individual;

Plaintiff,

v.

LAURA MAZEL, an individual; DOES I  
through X, inclusive; and ROES I through X,  
inclusive,  
Defendants.

Case Number: 2:24-cv-00356-JAD-EJY

~~PROPOSED~~ STIPULATED DISCOVERY  
PLAN AND SCHEDULING ORDER

Special Scheduling Review Requested

The parties held a scheduling conference under Federal Rule of Civil Procedure 26(f) on April 1, 2024. The parties now submit their proposed stipulated discovery plan and scheduling order.

1. Discovery Cut-Off Date. The filed Notice of Removal on February 21, 2024. Given the extent of damages claimed by Plaintiff and the need for extensive discovery and retention of expert witnesses by all parties, the parties agree time for discovery beyond that prescribed by LR 26-1(b) is necessary. The discovery cut-off date is October 18, 2024.

2. Amending the Pleadings and Adding Parties. The deadline to amend the pleadings and add parties is July 22, 2024..
3. Expert and Rebuttal-Expert Disclosures. The deadline to disclose experts is August 19, 2024. The deadline to disclose rebuttal experts is September 18, 2024.
4. Dispositive Motions. The deadline to file dispositive motions is November 18, 2024.
5. Pretrial Order. The deadline to file a pretrial order is December 17, 2024.
6. Fed. R. Civ. P. 26(a)(3). The disclosures required by this rule and any objections to them must be included in the joint pretrial order.
7. Alternative Dispute Resolution. The parties certify that they met and conferred about the possibility of using alternative dispute-resolution processes including mediation, arbitration, and if applicable, early neutral evaluation.
8. Alternative Forms of Case Disposition. The parties certify that they considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial Program (General Order 2013-01).

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9. Electronic Evidence. The parties certify that they discussed whether to present evidence in electronic format to jurors for the purpose of jury deliberations.

**IT IS SO STIPULATED.**

DATED: APRIL 15, 2024

HALL & EVANS, LLC

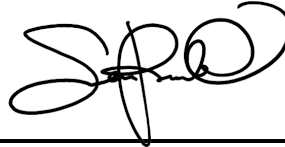
Permission to sign for

/s/ Jarod Penniman, Esq.

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LAURA MAZEL

DATED: APRIL 15, 2024

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WILLIAM RABAGO

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: April 15, 2024